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October 13, 2021

By ECF and Email

The Honorable Lewis A. Kaplan
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Daniel Kleeberg et al. v. Lester Eber et al.*, 1:16-cv-09517-LAK-KHP
Form of Order for Preliminary Injunction and Disclosure

Dear Judge Kaplan,

As directed by the Court, attached is a form of Order that incorporates the Court's rulings during today's conference in addition to the parties previously agreed-upon terms.

Please note that this form of Order differs slightly from one that was submitted by email alone late this afternoon. The version currently being submitted has been reviewed by Defendants' counsel, who advised that they have no objection to the form of this Order.

We thank the Court for its attention to this matter.

Respectfully submitted,



Brian C. Brook

cc: All counsel of record